

Charles R. Hoppin, Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Chairman Hoppin:

State Water Board Resolution 2009-0042 created a UST Cleanup Program Task Force and recognized that the Leaking Underground Fuel Tank (LUFT) Manual was actively being revised. The resolution also requires the LUFT manual revision be completed by January 2010. Both of these efforts are now concurrently active, and both are scheduled to produce final work products to the State Water Board by January 10, 2010. We recommend that the State Water Board approve an extension to the finalization of the LUFT Manual to June 30, 2010 for the following reasons:

- (1) Although the LUFT Manual cannot be prescriptive, and the Committee is trying to take a "best practices" approach to the recommendations for technical work, it would be a much stronger document if the final Task Force recommendations were reflected within the final LUFT Manual.
- (2) Many of the LUFT Manual Revision Committee members are also Task Force members. While this is beneficial to the State because of our expertise, this is creating a strain on our ability to meet the January 10, 2010 deadline for both work products. We believe that the highest priority for the January 10, 2010 deadline is the Task Force recommendations. We believe that postponing the working final LUFT Manual Revision until June 30, 2010 will allow us to do a better job of incorporating content and addressing public comments.

Sincerely,

Dawn Zemo
Sub-Committee Chair

Task Force Members in support of this recommendation:

Dawn Zemo, Zemo and Associates
Ray Kablanow, Geological Techniques Inc.
Rose Coughlin, Focused Resources
Howard Whitney, Remediation Testing and Design
Curt Stanley, Shell Global Solutions
Ron Chinn, Closure Solutions

Louis Mosconi, ConocoPhillips
David Arrieta, WSPA
Gary Barker, Horizon Environmental Inc.
Jennifer Hartman King, Downey Brand
Robert Schultz, AMEC Geomatrix Inc
Ravi Arulanantham, AMEC Geomatrix Inc
Markus Niebanck, Amicus-Strategic Environmental Consulting/Sierra Club
Damon Brown, Stantec Consulting Corp.
Craig Johns, PSSEP/CMTA
Shay Wideman, Valero Energy
Dick Zipp, RJZ Associates
John Ryan, George Figone Exemption Trust
Ken Frank, Chevron
Peter Niemiec, The Law Office of Peter Niemiec
Brian Newman, Regional Water Board (R5)
Ken Williams, Regional Water Board (R8)

cc:

Frances Spivy-Weber, Vice Chair
Tam M. Doduc, Member
Arthur G. Baggett, Jr., Member
Dorothy Rice, Executive Director